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7 *Attorneys for The Davey Tree Expert*
8 *Company, Davey Tree Surgery Company,*
and Davey Resource Group, Inc.

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10 **UNITED STATES BANKRUPTCY COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 In re:
12 PG&E CORPORATION
13 and
14 PACIFIC GAS AND ELECTRIC CO.,
15 Debtors.

- 16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric
18 Company
19 ☐ ☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case,*
21 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

NOTICE OF SPEAKING
ATTORNEYS PER COURT'S ORDER
ESTABLISHING CONFIRMATION
HEARING PROTOCOL

Date: May 27, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Related Docket Nos.: 7182 & 7304

1 TO THE BANKRUPTCY COURT, DEBTORS, AND ALL OTHER PARTIES IN INTEREST:

2 McDermott Will & Emery LLP and Nixon Peabody LLP, counsel to The Davey Tree
3 Expert Company, Davey Tree Surgery Company, and Davey Resource Group, Inc. (collectively,
4 “Davey”), submit this Notice in accordance with the Court’s Order Establishing Confirmation
5 Hearing Protocol [Doc. No. 7182], which directs, inter alia, that by May 22, 2020, “All parties that
6 intend to participate at the Confirmation Hearing must provide the Court with the names and e-
7 mail addresses of all speaking attorneys and witnesses.”

8 On May 15, 2020, Davey filed the *The Davey Tree Expert Company’s, Davey Tree*
9 *Surgery Company’s, And Davey Resource Group, Inc.’s (I) Objection And Reservation Of Rights*
10 *Of Regarding Assumption Of Various Contracts Pursuant To The Proposed Plan Of*
11 *Reorganization; And (II) Joinder To Objection Of The Official Committee Of Unsecured Creditors*
12 *To Plan Confirmation* [Docket No. 7304] (the “Objection”).

13 Davey files this Notice as a protective measure, in the event that any ground for objection
14 raised in the Objection continues to be at issue during the confirmation proceedings, including, but
15 not limited to, any objection to the Debtor’s intended disallowance of proofs of claim for
16 indemnification and contribution based upon the language in paragraph 13 of the “Schedule of
17 Executory Contracts and Unexpired Leases to be Assumed Pursuant to the Plan and Proposed
18 Cure Amounts” (Exhibit B to the Debtors’ “Plan Supplement” [Docket No. 7037]), Debtors’
19 failure to list the appropriate contracts for assumption, or the Plan’s proposed treatment of
20 unsecured claims.

21 Jeffrey M. Reisner (jreisner@mwe.com) and Kerri A. Lyman (klyman@mwe.com) will be
22 the “speaking attorneys” on behalf of Davey. In addition, the following attorney, who represents
23 Davey as counsel with respect to various contracts, claims, defenses, indemnity and contribution
24 rights, and other issues that are the subject of the Objection, will be a “speaking attorney” with

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1 respect to those matters:

2 Robert M. Blum (State Bar No. 83302)
3 rblum@nixonpeabody.com
4 NIXON PEABODY LLP
5 One Embarcadero Center, 32nd Floor
6 San Francisco, CA 94111-3600
7 Telephone: (415) 984-8311
8 Facsimile: (866) 244-0466

9 Davey does not intend to call any witnesses in connection with the confirmation
10 proceedings, but reserves the right to call witnesses at a later date, as necessary, in connection with
11 any proceedings related to assumption of executory contracts and/or cure amounts

12 MCDERMOTT WILL & EMERY LLP

13 By: /s/ Kerri A. Lyman
14 Kerri A. Lyman

15 *Attorneys for The Davey Tree Expert*
16 *Company, Davey Tree Surgery Company,*
17 *and Davey Resource Group, Inc.*

1 I, KERRI A. LYMAN, do declare and state as follows:

2 1. I am employed in the County of Orange, State of California. I am over the age of 18
3 years of age and not a party to the above-entitled action. My business address is 18565 Jamboree
4 Road, #250, Irvine, CA 92612.

5 2. I certify that, on May 22, 2020, I caused a true and correct copy of the foregoing
6 document, described as: NOTICE OF SPEAKING ATTORNEYS PER COURT'S ORDER
7 ESTABLISHING CONFIRMATION HEARING PROTOCOL, to be served via electronic mail
8 on the parties listed on the annexed Electronic Mail Notice List.

9 3. I further certify that, on May 22, 2020, I caused a true and correct copy of the foregoing
10 document, described as: NOTICE OF SPEAKING ATTORNEYS PER COURT'S ORDER
11 ESTABLISHING CONFIRMATION HEARING PROTOCOL, to be filed electronically with the
12 Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-
13 mail addresses denoted on the electronic mail notice list.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing
15 is a true and correct and that this declaration was executed on May 22, 2020, in Orange County,
16 California.

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18 /s/ Kerri A. Lyman

19 Kerri A. Lyman
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